REMARKS

The Examiner is thanked for the thorough review and consideration of the pending application. The Office Action mailed September 22, 2011 has been received and its contents carefully reviewed. No claims are amended by this paper. Claims 13 and 15-17 were previously canceled. Accordingly, claims 1-12 and 14 are pending. Reconsideration of the pending claims is respectfully requested.

The Office rejects all pending claims as follows:

- Claims 1-6, 8, 11-12, and 14 are rejected under 35 USC 103(a) as being unpatentable over US Pub. 2004/0163045 to Hui et al. (hereinafter *Hui*) in view of US Pub. 2006/0004910 to Burd (hereinafter *Burd*). *Office Action* at p. 3.

- Claims 7 and 9 rejected under 35 USC 103(a) as being unpatentable over *Hui* in view of *Burd* in further US Pat. 7,117,259 to Rohwer (hereinafter *Rohwer*). *Office Action* at p. 8.

- Claim 10 rejected under 35 USC 103(a) as being unpatentable over *Hui* in view of *Burd* in further view of US 2001/0040900 A1 to Salmi (hereinafter *Salmi*). *Office Action* at p. 9.

By way of background, and without any intention of importing a limitation of the specification into the claims, Applicant offers the following description: The invention relates to a method used to edit multimedia pages via a terminal. Due to memory and processing limitations on terminals, the invention is directed toward simplifying the editing of complex multimedia pages, in particular, **by storing, retrieving, or deleting** specific parameters **in the memory of the terminal** upon the requests from a **server**.

Hui discloses a method to create a single XML-based system to execute a synchronized multimedia presentation with, possibly, different events such as a user event, a system event, or a timed event.

It is respectfully submitted that *Hui* fails to teach or suggest at least:

transmitting, from the server, at least a part of said set of associated parameters, and an instruction to store said part of said set of associated parameters in a memory of the terminal; and

transmitting, from the server, an instruction to restore said part of said set of associated parameters previously stored in said memory of the terminal, to edit at least one multimedia page in which an object identified by said set of associated parameters occurs

as recited in independent claim 1, and

an instruction to store, in a memory of a terminal, at least one parameter of at least one object intended to be arranged, according to said parameter, in a multimedia page suitable for editing on said terminal; and

an instruction to restore the at least one parameter previously stored in the memory of the terminal

as recited in independent claim 12.

In other words, *Hui* fails to teach or suggest at least:

*a) a preliminary step during which **the server transmits** at least a part of said set of parameters associated with the object, and **an instruction to store** said part of the set of parameters **in a memory of the terminal**,*

*b) and a main step during which **the server transmits** a simple **instruction to restore** said part of parameters previously **stored in said memory of the terminal**, to edit at least one multimedia page in which said object occurs.*

The Office admits that *Hui* fails to disclose such points. *Office Action* at p. 3 ("Hui lacks storing the object in the memory of terminal and restoring the object to edit the web page.") The Office relies on *Burd* to cure the deficiencies of *Hui*.

Applicant, however, respectfully submits that *Burd* fails to cure the deficiencies of *Hui*. Indeed, *Burd*, like *Hui*, fails to teach or suggest the same features of independent claims 1 and 12 as recited above.

Burd discloses that an ActiveX control may be incorporated in a web page on a client. *Burd* at ¶ [0028]. This ActiveX control may be referenced with a "locator" (a locator is, for instance, a URL as described at paragraph [0028]).

Even if, for arguments sake, a browser could implicitly retrieve the ActiveX control from its memory if "*the browser already has the code … within its storage system*," there is no teaching or suggestion that an instruction for this retrieving (or storage) has been transmitted from the server, as recited in claims 1.

The server of *Burd* only instructs the browser to use a given ActiveX referenced by a locator and the storage seems to be **at the initiative of the browser** (*i.e.*, standard caching process) and **not at the initiative of the server** (as in claim 1).

The Examiner also refers to paragraphs [0076]-[0077] for this matter. As indicated in paragraph [0072], FIG. 6 refers to a **server-side processing**. Thus, the restoration of the hierarchy mentioned in paragraph [0077] is performed within the server memory and not in the

client memory as recited in claim 1 ("The <u>server</u> … loads the state data … to <u>restore</u> each control object").

Finally, the examiner refers to paragraphs [0109]-[0111] of *Burd*. These paragraphs refer to FIG. 8. As described in FIG. 8, the different steps are executed on the server-side (steps between "*from client*" and "*to client*" are executed by the server and not on the terminal side). Then, these steps are performed **within the server** and **not on the client side** as recited in claim 1 ("in a memory of a terminal").

Moreover, this statement is supported by paragraphs [0109]-[0111] themselves. Indeed, data change events on a web page trigger **server-side events** that may update a database on the server side and not on the terminal side. *See Burd* at ¶ [0109].

Burd also discloses that coordinates in an image may be stored as properties in a **server-side** object and not on **a terminal memory** as recited in claim 1. *See Burd* at ¶ [0111].

Nothing in the combination of *Hui* and *Burd* would have suggested to the person of ordinary skill in the art at the time of the invention, to transmit specific instructions <u>from the server side</u> for organizing the <u>memory of the terminal</u> and thus to save processing time and bandwidth on the terminal side.

Thus, the person of ordinary skill in the art would not have contemplated the improvement as-claimed in independent claims 1 and 12 at the time of the invention even if that person was in possession of *Hui* and *Burd* and was faced with the same problems faced by the inventor of the present invention. The person skilled in the art would have no reason to even try to combine *Hui* and *Burd* to obtain the above-recited features of independent claims 1 and 12.

Consequently, it is submitted that the subject matter of independent claims 1 and 12 is patentably distinguishable over the combination of *Hui* and *Burd*.

Rohwer fails to cure the deficiencies of *Hui* and *Burd*. In fact, *Rohwer* was only cited for purportedly pertinent teachings of limitations peculiar to dependent claims 7 and 9. *Office Action* at p. 8.

Salmi fails to cure the deficiencies of *Hui* and *Burd*. In fact, *Rohwer* was only cited for a purportedly pertinent teaching of "a mobile terminal capable of interaction with Cellular network

and *Salmi* teaches at least one terminal is a mobile terminal arranged to cooperate with a cellular network." *Office Action* at pp. 9-10.

For at least the above-stated reasons, Applicant respectfully asserts that independent claims 1 and 12 are patentably distinguishable over *Hui*, *Burd*, *Rohwer*, and *Salmi*, whether considered individually or in any combination. Claims 2-11 and 14 depend, directly or indirectly, from independent claims 1 and 12, respectively. It stands to reason that these dependent claims are likewise patentably distinguishable over the cited references for at least the same reasons as their respective independent claims. Accordingly, Applicant respectfully requests withdrawal of the various 35 U.S.C. § 103(a) rejections of claims 1-12 and 14.

CONCLUSION

Applicant respectfully asserts that this application is in condition for allowance and early, favorable action is respectfully solicited. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7106 to discuss the steps necessary for placing the application in condition for allowance.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to Deposit Account No. 50-0911.

Dated: December 22, 2011   Respectfully submitted,

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